

I have tried to make sense of Prof. Rappaport's many and varied complaints about the progress that has occurred in the amateur radio art in the past 2 decades. The Professor appears to misunderstand or misrepresent an astonishing number of facts, but more dangerously believes in unfounded conspiracy theories and wishes to set the radio art back several decades.

Prof. Rappaport apparently seriously misreads 97.309(b). He would have us believe that it reads, "...a station may NEVER transmit a RTTY or data emission with an unspecified code, because this would OBVIOUSLY be for the purpose of obscuring the meaning of any communication!" -- when in fact the wording is completely the opposite --- 97.309(b) actually authorizes the transmission of unspecified codes, except to a station or country with which the US does not have an applicable agreement, provided that the codes are not used for the purpose of obscuring the meaning. By seriously distorting the actual wording of the regulation, Prof. Rappaport creates a completely fallacious argument which goes on and on for paragraph after paragraph. As has been carefully explained by the WINLINK developers, the compression methods used for winlink pactor communications are fully specified since they turn off the PACTOR inherent compression. Further, how can one argue an intent to "obscure" when I am able to read all the communications that proceed through my Gateway? And when the developers indicate that these can also be utilized by others with a valid purpose? Prof. Rappaport commits a serious error.

Over and over in his complaint, Prof. Rappaport seems to be determined to restrict the usage of data portions of the USA amateur bands to only the narrowest of emissions. He appears to have a singular dislike for PACTOR. His concerns seem so unbalanced as to wonder if he has experience with the popular and free software, FLDIGI -- which includes such modes as Contestia 64/1000, Domino EX88, MFSK128, Olivia 64/2K, BPSK1000, Thor1000, and others. His single-minded diatribe against PACTOR, which is utilized by the WINLINK system, and not all the other modes makes one wonder what is his true concern or agenda! And all of this is cloaked in an incredible conspiracy theory concern.

In my experience there are scores of kHz of the 80 meter band restricted to phone/image which are almost completely unused. Rather than following the desires of persons such as Professor Rappaport to restrict the development of advanced spectral conservation techniques such as Pactor IV, I would suggest that the Commission re-evaluate portions of bands that are largely unused and further the progress of the art of digital communications!

In summary, Professor Rappaport's view seem to be inimical to two of the most important goals of the Amateur Services:

- (b) Continuation and extension of the amateur's proven ability to contribute to the advancement of the radio art.
- (c) Encouragement and improvement of the amateur service through rules which provide for advancing skills in both the communication and technical phases of the art.

Therefore I would urge the FCC to continue to further the advancement of the radio art, rather than furthering the goals of Professor Rappaport to squelch that advancement.

Sincerely,

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